

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC
(PETRO),

Plaintiff,

vs.

ISLAND PROJECT AND OPERATING
SERVICES, LLC, VITOL US HOLDING II
CO., VITOL VIRGIN ISLANDS CORP,
ANDREW CANNING and OPTIS
EUROPE, LTD.,

Defendants.

CASE NO. 1:21-CV-00312

BREACH OF CONTRACT

JURY TRIAL DEMANDED

NOTICE OF DEPOSITION OF TERRENCE KEOGH

TO: Glenda L. Lake, Clerk of the Court
District Court of the V.I.

Alex Kaplan, Esq.
Y. Gloria Park, Esq.
Susman Godfrey
1000 Louisiana St., Suite 5100
Houston, TX 77002
Email Address: akaplan@susmangodfrey.com; GPark@susmangodfrey.com
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Andrew C. Simpson, Esq.
Andrew C. Simpson, P.C.
2191 Church Street, Suite 5
Christiansted, VI 00820
Email Address: asimpson@coralbrief.com
Attorney For: Andrew Canning

Carl A. Beckstedt, III, Esq.
Beckstedt & Kuczynski LLP
2162 Church Street
Christiansted, USVI 00820
Email Address: carl@beckstedtlaw.com; tarsha@beckstedtlaw.com;
gpark@susmanodfrey.com; akaplan@susmangodrfey.com
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312

NOTICE OF DEPOSITION OF TERRENCE KEOGH

Page 2

Simone Francis, Esquire
Ogletree, Deakins, Nash, Smoak & Stewart, LLC
The Tunick Building, Suite 201
1336 Beltjen Road
St. Thomas, VI 00802
Email Address: simone.francis@ogletreedeakins.com
Attorney For: Island Project and Operating Services, LLC
Attorney For: Andrew Canning

Yvonne Setorie
Elite Reporting Services, Inc.
P.O. Box 5619
Christiansted, VI 00823
Email Address: elitereportingsvcs@gmail.com

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26, 30 and 32, Plaintiff **Petro Industrial Solutions, LLC**, by and through undersigned counsel, will take the oral examination of **TERRENCE KEOGH**, on **May 25, 2023**, at **9:00 AM** **Lee J. Rohn and Associates, LLC**, at **56 King Street, Third Floor, Christiansted, VI 00820**.

This deposition is being taken for use as evidence and/or trial purposes and may be continued from day to day until completed.

RESPECTFULLY SUBMITTED
LEE J. ROHN AND ASSOCIATES, LLC
Attorneys for Plaintiff

DATED: April 13, 2023

BY: /s/ Lee J. Rohn
Lee J. Rohn, Esquire
VI Bar No. 52
1108 King Street, Suite 3 (mailing)
56 King Street, Third Floor (physical)
Christiansted, St. Croix
U.S. Virgin Islands 00820
Telephone: (340) 778-8855
lee@rohnlaw.com

Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312

NOTICE OF DEPOSITION OF TERRENCE KEOGH

Page 3

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on April 13, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

Alex Kaplan, Esq.
Y. Gloria Park, Esq.
Susman Godfrey
1000 Louisiana St., Suite 5100
Houston, TX 77002
Email Address: akaplan@susmangodfrey.com; GPark@susmangodfrey.com
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Andrew C. Simpson, Esq.
Andrew C. Simpson, P.C.
2191 Church Street, Suite 5
Christiansted, VI 00820
Email Address: asimpson@coralbrief.com
Attorney For: Andrew Canning

Carl A. Beckstedt, III, Esq.
Beckstedt & Kuczynski LLP
2162 Church Street
Christiansted, USVI 00820
Email Address: carl@beckstedtlaw.com; tarsha@beckstedtlaw.com;
gpark@susmanodfrey.com; akaplan@susmangodrfey.com
Attorney For: Vitol Virgin Islands Corp. and VITOL US Holding II Co.

Simone Francis, Esquire
Ogletree, Deakins, Nash, Smoak & Stewart, LLC
The Tunick Building, Suite 201
1336 Beltjen Road
St. Thomas, VI 00802
Email Address: simone.francis@ogletreedeakins.com
Attorney For: Island Project and Operating Services, LLC

Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No.
1:21-CV-00312

NOTICE OF DEPOSITION OF TERRENCE KEOGH

Page 4

I also caused a true and correct copy of the foregoing to be served via electronic mail upon the following:

Yvonne Setorie
Elite Reporting Services, Inc.
P.O. Box 5619
Christiansted, VI 00823
Email Address: elitereportingsvcs@gmail.com

BY: /s/ Lee J. Rohm (kj)